

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

LUIS ALBERTO ALVAREZ, JR.,

individually and on behalf of himself and others similarly situated, Case No.: 1:16-cv-04156-CM

Plaintiff,

Hon. Colleen McMahon

V.

NATIONAL DEBT RELIEF LLC,
DANIEL TILIPMAN, and ALEX
KLEYNER,

Defendants.

AFFIDAVIT IN SUPPORT OF JOANNE P. MURRAY

Joanne P. Murray, being duly sworn according to law, does depose and say:

1. I am the Director of Human Resources for Defendant National Debt Relief LLC (“NDR”).

2. I am familiar with the facts and circumstances surrounding Plaintiff Luis Alberto Alvarez, Jr.'s ("Mr. Alvarez") employment with NDR, in particular his signed acknowledgement of the Employee Handbook and the Mutual Arbitration Agreement (the "Arbitration Agreement") contained therein.

3. In February 2016, Mr. Alvarez received an electronic copy of NDR's Employee Handbook, which contained the Arbitration Agreement.

4. Mr. Alvarez provided his electronic signature on the acknowledgement form at the end of the Employee Handbook.

5. Mr. Alvarez's signature and consent to the Arbitration Agreement was a condition of his employment with NDR.



Joanne P. Murray

Sworn to before me this
5th day of July, 2016

A. Greenhill
Notary Public

AGNIESZKA GREENHILL
Notary Public, State of New York
No. 01GR6304094
Qualified in Bronx County
Commission Expires May 19, 2018